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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LORI JEAN YAHN, individually and as co-
Special Administrator of the Estate of
TIMOTHY J. YAHN, deceased; KYLE
JAMES YAHN, individually; ZACHARY
LEE YAHN, individually; ALEXANDER
SCOTT YAHN, individually; JANICE
GONALEZ, as Co-Special Administrator of
the Estate of TIMOTHY J. YAHN, deceased,

Plaintiffs,

v.

KENTUCKY WESTERN CO., a foreign
corporation; MARTIN DOUGLAS WILSON,
an individual; DOES 1 through 10; ROE
ENTITIES 11 through 20; and ABC
LIMITED LIABILITY COMPANIES 21
through 30,

Defendants.

CASE NO. 3:21-cv-00227-MMD-WGC

Formerly Case No. 2:21-cv-00890

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND THE TIME TO
FILE DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION TO REMAND**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs LORI JEAN
YAHN, KYLE JAMES YAHN, ZACHARY LEE YAHN, ALEXANDER SCOTT YAHN,
and JANICE GONALEZ, by and through their attorneys, VICTORIA R. ALLEN, ESQ. of the
law firm of NETTLES & MORRIS, and Defendants KENTUCKY WESTERN CO., and
MARTIN DOUGLAS WILSON, by and through their attorneys, STEVEN T. JAFFE, ESQ.,

1 and DANIEL C. TETREAULT, ESQ. of the law firm of HALL JAFFE & CLAYTON, LLP,
2 that the time to respond to the Plaintiff's Motion to Remand will be extended from June 4,
3 2021 to June 11, 2021.

4 **IT IS SO STIPULATED.**

5 DATED this 3rd day of June, 2021.

6 HALL JAFFE & CLAYTON, LLP

7
8 /s/ Steven T. Jaffe, Esq.
9 STEVEN T. JAFFE, ESQ.
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10 DANIEL C. TETREAULT, ESQ.
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11 Las Vegas, Nevada 89128
12 *Attorneys for Defendants*
Kentucky Western Co., and Martin
13 *Douglas Wilson*

DATED this 3rd day of June, 2021.

NETTLES | MORRIS

/s/ Victoria R. Allen
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14 **ORDER**

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17 IT IS FURTHER ORDERED that Defendants' Response to Plaintiffs' Motion to
18 Remand shall be due on June 11, 2021.

19 DATED this 3rd day of June, 2021.

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FEDERAL COURT JUDGE